

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

W.R. GRACE & CO., et al.,

Debtors.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS and
OFFICIAL COMMITTEE OF ASBESTOS
PROPERTY DAMAGE CLAIMANTS OF
W.R. GRACE & CO., suing on behalf of the
Chapter 11 Bankruptcy Estate of W.R.
GRACE & CO., et al.,

Plaintiffs,

- against-

SEALED AIR CORPORATION and
CRYOVAC, INC.,

Defendants.

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS and
OFFICIAL COMMITTEE OF ASBESTOS
PROPERTY DAMAGE CLAIMANTS OF
W.R. GRACE & CO., suing on behalf of the
Chapter 11 Bankruptcy Estate of W.R.
GRACE & CO., et al.,

Plaintiffs,

- against-

FRESENIUS MEDICAL CARE
HOLDINGS, INC. and
NATIONAL MEDICAL CARE, INC.

Defendants.

Chapter 11

Case No. 01-01139 (JKF)
(Jointly Administered)

Adv. No. 02 - 2210
[LEAD DOCKET]

Adv. No. 02 - 2211

Hearing Date: August 9, 2010, at 10:00 a.m.
Objection Deadline: July 23, 2010 at 4:00 p.m.

**NOTICE OF MOTION TO RE-OPEN FRAUDULENT CONVEYANCE ADVERSARY
PROCEEDINGS TO PERMIT THE FILING OF REMAINING QUARTERLY FEE
APPLICATIONS AND ALLOWANCE AND PAYMENT
OF REMAINING HOLDBACKS**

TO: Parties required to receive notice pursuant to Del. Bankr. LR 2002-1.

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the attached *Motion to Re-Open Fraudulent Conveyance Adversary Proceedings to Permit the Filing of Remaining Quarterly Fee Applications and Allowance and Payment of Remaining Holdbacks* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A true and correct copy of the Motion is attached hereto.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on **July 23, 2010**. At the same time, you must also serve a copy of the objections or responses, if any, upon the following: (i) co-counsel for the Debtors, Theodore L. Freedman, Kirkland & Ellis LLP, Citigroup Center, 601 Lexington Avenue, New York, NY 10022-4611 (fax number 212-446-4800), Janet S. Baer, The Law Offices of Janet S. Baer, P.C., 70 West Madison Street, Suite 2100, Chicago, IL 60602 (Fax number 312-641-2165); and James E. O’Neill, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, PO. Box 8705, Wilmington, DE 19899-8705 (Courier 19801) (fax number 302-652-4400); (ii) counsel to the Official Committee of Unsecured Creditors, Lewis Kruger, Stroock & Stroock & Lavan, 180 Maiden Lane, New York, NY 10038-4982 (fax 212-806-6006), and Michael R. Lastowski, Duane, Morris & Heckscher, LLP, 1100 N. Market Street, Suite 1200, Wilmington, DE 19801-1246 (fax 302-

657-4901); (iii) counsel to the Official Committee of Property Damage Claimants, Scott L.

Baena, Bilzin, Sumberg, Dunn, Baena, Price & Axelrod, First Union Financial Center, 200 South

Biscayne Boulevard, Suite 2500, Miami, FL 33131 (fax 305-374-7593), and Michael B. Joseph,

Ferry & Joseph, P.A., 824 Market Street, Suite 904, P.O. Box 1351, Wilmington, DE 19899 (fax

302-575-1714); (iv) counsel to the Official Committee of Personal Injury Claimants, Elihu

Inselbuch, Caplin & Drysdale, Chartered, 375 Park Avenue, 35th Floor, New York, NY 10152-

3500 (fax 212-644-6755), and Marla Eskin, Campbell & Levine, LLC, 800 N. King Street, Suite

300, Wilmington, DE 19801 (fax 302-426-9947); (v) counsel to the Official Committee of

Equity Holders, Thomas M. Mayer, Kramer Levin Naftalis & Frankel LLP, 919 Third Avenue,

New York, NY 10022 (fax 212-715-8000), and Teresa K.D. Currier, Saul Ewing LLP, 222

Delaware Avenue P.O. Box 1266, Wilmington, DE 19899-1397 (fax 302-421-6813);

(vi) counsel to the Future Claimants' Representative, Richard H. Wyron, Swidler Berlin Shereff

Friedman, LLP, 3000 K Street, NW, Suite 300, Washington, DC 20007 (fax 202-424-7643), and

John C. Phillips, Jr., Phillips, Goldman & Spence, P.A., 1200 North Broom Street, Wilmington,

DE 19806 (fax 302-655-4210); (vii) the Office of the United States Trustee, Attn: David

Klauder, 844 N. King Street, Wilmington, DE 19801 (fax 302-573-6497); and (viii) counsel to

the Property Damage Future Claimants' Representative, Karl Hill, Seitz, Van Ogtrop & Green,

P.A., 222 Delaware Avenue, Suite 1500, P.O. Box 68, Wilmington, DE 19899 (fax 302-888-

0606) and Alan B. Rich, Law Office of Alan B. Rich, Esq., 4244 Renaissance Tower, 1201 Elm

Street, Dallas, TX 75270 (fax 214-744-5101).

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE JUDITH K. FITZGERALD ON **AUGUST 9, 2010 AT 10:00 A.M.**, EASTERN TIME AT THE UNITED STATES BANKRUPTCY COURT, 824 MARKET STREET, WILMINGTON, DELAWARE 19801.

Dated: July 2, 2010

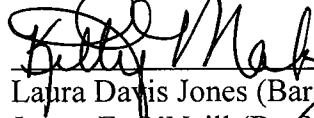
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